

ROUGH DRAFT -- John Nau
1/17/2023

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1 A All at San Angelo.

2 Q What position were you hired as?

3 A I was hired as a equipment operator, level 1.

4 Q And was that working out of the San Angelo, is
5 that your home base?

6 A Yes, home base was San Angelo. I was by -- I
7 was hired at San Angelo.

8 Q Did you work out in what they call pads?

9 A Yeah.

10 Q In the San Angelo area?

11 A Yeah. I worked all in the field.

12 Q Do you remember who hired you?

13 A Lee Gibson was the person that I had
14 interviewed with. And then the terminal manager at the
15 time was actual that [KA-RPL] phone.

16 Q Can you spell that for me?

17 A TUUTA last name KALAMAFONI.

18 Q You said you knew some friends that were
19 working there before you started working?

20 A Yes.

21 Q Do you know -- remember their names?

22 A One of them was crew chief, polly POLI.

23 Q POLI?

24 A Yes, sir.

25 Q Do you remember a last name for him?

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1 of people that were laid off as referenced in this
2 declaration?

3 MR. YEZIERSKI: Objection to form. Go
4 lady and answer to the best of your ability.

5 A I don't know how many people were laid off, to
6 be honest. But I know majority of the guys that I
7 worked with were all laid off after I was laid off.

8 Q Do you know why they were laid off?

9 A I never asked.

10 Q Do you know today why they were laid off?

11 A I --

12 Q Do you have any reason to know that COVID-19
13 kind of shut down the economy and a lot of these oil
14 companies didn't want to use fracking services anymore
15 because the price of oil was so low?

16 MR. YEZIERSKI: I'm going to object to
17 form. But to the extent you are know, you can answer.

18 Q Did you know that?

19 A Could you reanswer or rephrase your question?

20 Q Sure. Were you aware that in the spring,
21 like, March, April time frame?

22 A Uh-huh.

23 Q Of 2020, that COVID-19 kind of shut the
24 economy down and the price of oil tanked and then the
25 oil companies told frackers like U.S. well services to

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1 stop working? Are you aware of that?

2 A No, I was not aware of that.

3 Q How do you know that people after you got
4 terminated were terminated?

5 A Just from other people I've heard, you know,
6 just rumors from other people that other people were
7 laid off. I've also talked with friends of mine that I
8 see randomly here and there, and they also have been
9 laid off. They're working for a different frac company
10 now.

11 Q But you never asked them why -- or you don't
12 know why they were terminated from U.S. Wells?

13 A I don't know why they were terminated, but I
14 flow that U.S. well service did let them go.

15 Q Do you believe that U.S. well service unfairly
16 terminated you?

17 A I do.

18 Q Can you tell me why you believe that?

19 A I believe that I was terminated wrongfully due
20 to the fact na there was no notice given of me being
21 terminated. And on top of that, with them not allowing
22 us to finish out our hitch, which is our last day of
23 hitch, in my eyes is wrong.

24 Q Is it -- did you feel that them not letting
25 you finish your last day of hitch was wrong because you